

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF IOWA
WESTERN DIVISION

UNITED STATES OF AMERICA,)	CR04-4025-MWB
)	
Plaintiff,)	
)	
vs.)	DEFENDANT'S RESPONSE
)	TO PETITION TO REVOKE
RONALD LEE PRESTON RUPP,)	SUPERVISION
)	
Defendant.)	

COMES NOW the Defendant, Ronald Rupp, and states to the Court as follows:

1. Mr. Rupp was charged with Driving While Barred on January 3, 2016. He promptly contacted his U.S. Probation Officer and met with his U.S. Probation Officer as required by the rules. Mr. Rupp has pled not guilty to the charge of Driving While Barred. A trial date is pending. Mr. Rupp is presumed to be innocent as a matter of law.

2. Mr. Rupp was arrested on February 15, 2016 for Driving While License Barred. He promptly contacted his U.S. Probation Officer as required. Mr. Rupp was required to perform 40 hours of community service, which has been satisfied. A trial date is pending. Mr. Rupp is presumed to be innocent as a matter of law.

3. Mr. Rupp has been subjected to constant surveillance and GPS tracking by law enforcement. Mr. Rupp has been subjected too numerous, meritless, extended traffic stops. During those stops he has been threatened with life imprisonment and harassed by local law enforcement officers. Of course, there is no recourse for Mr. Rupp to stop this harassment rather than to terminate the supervised release so that law enforcement cannot abuse the right to stop him and search him at any time without probable cause.

4. Mr. Rupp, as a passenger, was pulled over without probable cause in South Sioux City, Nebraska as a passenger in a motor vehicle on June 30, 2016. Mr. Rupp contacted his U.S. Probation Officer as required. No charges were filed.

5. On August 20, 2016, Mr. Rupp was arrested by Sioux City Police Department (not Woodbury County Sheriff's Department). Mr. Rupp contacted his U.S. Probation Officer immediately upon arrest, as required. Mr. Rupp has pled not guilty. A trial date is pending. Mr. Rupp is presumed to be innocent as a matter of law.

WHEREFORE, the Defendant prays the Court terminate his supervised release to protect his from further harassment by law enforcement officers.

Dated this 21st day of September, 2016.

Respectfully submitted,

RHINEHART LAW, P.C.

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ATTORNEYS FOR DEFENDANT

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing instrument was served upon all parties to the above cause to each of the attorneys of record herein at their respective addresses disclosed on the pleading on September 21, 2016.

By: ☐ U.S. Mail ☐ Facsimile
☐ Hand delivered ☐ Overnight courier
☒ E-file

Signature /s/ Tara Osterholt